Case 17-15761-jkf Doc 29 Filed 07/12/18 Entered 07/12/18 17:42:25 Desc Main

## Document Page 1 of 2 LOCAL BANKRUPTCY FORM 9014-3 IN THE UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: Robert Turner	Debtor	CHAPTER 13
U.S. ROF III Legal Title Trust 2015-1, by U.S. Bank National Association, as Legal Title Trustee Movant		CITAL TEXTS
vs.		NO. 17-15761 JKF
Robert Turner	Debtor	NO. 17-13/01 JKI
Blondell G. Turner	Co-Debtor	
Frederick L. Reigle Esq.	Trustee	11 U.S.C. Section 362 and 1301

## NOTICE OF MOTION, RESPONSE DEADLINE AND HEARING DATE

U.S. ROF III Legal Title Trust 2015-1, by U.S. Bank National Association, as Legal Title Trustee has filed a motion with the court for relief from the automatic stay of Section 362 of Title 11 of the United States Code, as amended (the Bankruptcy Code), and from the codebtor stay of Section 1301 of the Bankruptcy Code.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult an attorney.)

- 1. If you do not want the court to grant the relief sought in the motion, then on or before July 26, 2018 you or your attorney must do <u>all</u> of the following:
  - (a) file an answer explaining your position at:

United States Bankruptcy Court Robert N.C. Nix Building 900 Market Street, Suite 400 Philadelphia, PA 19107-4299

If you mail your answer to the bankruptcy clerk's office for filing, you must mail it early enough so that it will be received on or before the date stated above; and

(b) mail a copy to movant's attorney:

Rebecca A. Solarz, Esquire KML Law Group, P.C. Suite 5000 - BNY Mellon Independence Center 701 Market Street Philadelphia, PA 19106-1532

- 2. If you or your attorney do not take the steps described in paragraphs 1(a) and 1(b) above and attend the hearing, the court may enter an order granting the relief requested in the motion.
- 3. A hearing on the motion is scheduled to be held before the Honorable Jean K. Fitzsimon, the United States Bankruptcy Judge, in Courtroom No. 3 at the United States Bankruptcy Court, Robert N.C. Nix Building, 900 Market Street, Suite 400, Philadelphia, Pa. 19107-4299 on August 15, 2018, at 9:30 a.m., or as soon thereafter as counsel can be heard, to consider the motion.

## Case 17-15761-jkf Doc 29 Filed 07/12/18 Entered 07/12/18 17:42:25 Desc Main Document Page 2 of 2

- 4. If a copy of the motion is not enclosed, a copy of the motion will be provided to you if you request a copy from the attorney named in paragraph 1(b).
- 5. You may contact the Bankruptcy Clerk's office at 215-408-2800 to find out whether the hearing has been canceled because no one filed an answer.

/s/ Rebecca A. Solarz, Esquire

Rebecca A. Solarz, Esquire KML Law Group, P.C. 701 Market Street, Suite 5000 Philadelphia, PA 19106-1532

Phone: (215) 627-1322 Fax: (215) 627-7734

Attorneys for Movant/Applicant

July 12, 2018